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Attorneys for Plaintiffs AMAZON.COM, INC.  
 and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware  
 corporation, and AMAZON TECHNOLOGIES,  
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF EMILY GOODELL  
 IN SUPPORT OF PLAINTIFFS  
 AMAZON.COM, INC. & AMAZON  
 TECHNOLOGIES, INC.'S MOTION FOR  
 DEFAULT JUDGMENT AGAINST  
 DEFENDANTS (1) VTLOGODESIGN,  
 INC.; (2) MK AFFILIATES, INC.; (3) ALI  
 ALAM; (4) DYNAMIC DIGITAL  
 SOLUTIONS LLC; (5) MEHWASH  
 MUNIR; (6) ONE STOP COMPUTER  
 SERVICES LLC; (7) MUHAMMAD  
 ZUBAIR KHAN; (8) TECHTURE INC.; (9)  
 MUHAMMAD MUDASSAR ANWAR; (10)  
 TECH DRIVE PVT LLC; (11) ASHHAR  
 RAWOOF; (12) SMART STARTUP  
 SOLUTIONS; (13) MUHAMMAD USMAN  
 KHAN; (14) YASIR AGAR; (15)  
 MUHAMMAD SHIRAZ QURESHI; AND  
 (16) MAVIA NIZAM**

**Hearing Date: December 10, 2024**  
**Time: 2:00 pm**  
**Location: San Francisco**  
**Courtroom 09, 19th Flr**  
 Complaint filed: October 30, 2023

1 I, EMILY GOODELL, declare as follows:

2 1. I am an attorney with the law firm of Davis Wright Tremaine LLP (“DWT”),  
 3 which represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (“Amazon”) in the  
 4 above-entitled action. I make this Declaration in support of Plaintiffs’ Motion for Default  
 5 Judgment Pursuant to Federal Rule of Civil Procedure 55(b) as to Defendants (1) VTLogodesign,  
 6 Inc.; (2) MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash  
 7 Munir; (6) One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtute Inc.;  
 8 (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart  
 9 Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz  
 10 Qureshi; and (16) Mavia Nizam (“Defendants”). The following facts are personally known by me  
 11 to be true and, if called and sworn as a witness, I could and would competently testify as follows.

12 2. Amazon filed its Complaint in this action on October 30, 2023. ECF No. 1.

13 3. Since October 30, 2023, all 18 Defendants have been served in this matter.

14 4. Defendants Umer Wasim and Teknoby1 Digital LLC (the “Wasim Parties”) are the  
 15 only Defendants who have appeared in the case to date.

16 5. The Wasim Parties timely filed an Answer on March 8, 2024. ECF No. 58.

17 6. Amazon and the Wasim Parties have entered into settlement negotiations.

18 7. On November 2, 2023, I received an email from an individual at  
 19 aa.alialam@gmail.com that was signed by Ali Alam, Mehwash Munir, Dynamic Digital  
 20 Solutions, and One Stop Computer Services. The email confirmed notice of the lawsuit. A true  
 21 and correct copy of this email is attached hereto as **Exhibit A**.

22 8. Mr. Alam stopped responding to my emails requesting further information after  
 23 November 20, 2023. Neither he nor the undersigned Defendants to the email in Exhibit A had any  
 24 further contact with me or appeared in this case, although they were aware they have been sued  
 25 and the case was still active.

26 9. On February 21, 2024, I received a call from an individual who identified himself  
 27 as Defendant Qureshi. Mr. Qureshi confirmed that he had received the copy of the Complaint I  
 28

1 provided by registered email on October 31, 2023 and by personal service to his residence in  
2 Pakistan.

3 10. On May 10, 2024, I received an email from attorney Brenda A. Prackup, indicating  
4 that she had been retained by Defendant Qureshi. A true and correct copy of my correspondence  
5 with Ms. Prackup is attached hereto as **Exhibit B**.

6 11. I met and conferred with Ms. Prackup by phone on May 10, 2024 and May 31,  
7 2024. I requested that Mr. Qureshi provide certain specific information about his involvement  
8 with and knowledge of the allegations in the Complaint.

9 12. I have not received any communications from Ms. Prackup since our call on May  
10 31, 2024.

11 13. To date, no attorney for Mr. Qureshi has appeared in the case and Mr. Qureshi has  
12 not served any responsive pleading or moved to set aside the default.

13 14. On November 9, 2023, I received a phone call from an individual who identified  
14 himself as Sharjeel Mehmood, and said that he was the manager of Defendant Techtute, Inc.  
15 (“Techtute”).

16 15. Mr. Mehmood said that he received a copy of my email sent to Defendant  
17 Muhammad Zubair Khan, which contained a copy of the Complaint, and said that Mr. Khan was  
18 aware of the lawsuit. I did not receive further communications from Mr. Mehmood.

19 16. On July 8, 2024, I received an email from an attorney, Haroon Manjlai, indicating  
20 that he represented Mr. Khan and Techtute.

21 17. I responded to Mr. Manjali’s email on July 10, 2024, but have had no further  
22 communications with Mr. Manjlai or his clients since. Mr. Khan has not served a responsive  
23 pleading or appeared in the case.

24 I declare under penalty of perjury under laws of the State of California that the foregoing  
25 is true and correct. Executed this 13th day of September, 2024 in Seattle, Washington.

26  
27 /s/ Emily Goodell

28 Emily Goodell (*pro hac vice*)

# EXHIBIT A

**From:** Ali Alam <aa.alialam@gmail.com>  
**Sent:** Thursday, November 2, 2023 9:55 AM  
**To:** Freed, Jake  
**Cc:** Goodell, Emily  
**Subject:** <https://protect-us.mimecast.com/s/RJdkCW68o5HLABpgc6TCc9?domain=amazon.com>,  
Inc. Notice of Litigation and Preservation Demand

**Categories:** Filed to ND  
**FilingIndicator:** -1

[EXTERNAL]

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Good afternoon,

We received this lawsuit and we have insufficient knowledge of these allegations. All I know is that I allowed one of our outsourced vendors overseas to charge their customers using our merchant accounts. They told me it was for their web development customers and I have no knowledge of what they were doing with amazon publishing. Please let me know what we should do.

Thanks.

Ali Alam  
Mehwash Munir  
Dynamic Digital Solutions  
One Stop Computer Services

# EXHIBIT B

**From:** brenda baplawoffice.com <brenda@baplawoffice.com>  
**Sent:** Friday, May 10, 2024 9:33 AM  
**To:** MacNaughton, Bonnie; Goodell, Emily; Freed, Jake  
**Subject:** Amazon v. Wasim et al/USDC Case No. 3:23-CV-05580

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[EXTERNAL]

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Dear Counsel,

I have been retained by Muhammad Shiraz Quereshi, a defendant named in the above referenced matter. I would like to set up a time to discuss this matter with you. Please let me know your availability.

Brenda A. Prackup, Attorney At Law  
4470 W. Sunset Blvd #91902  
Los Angeles, CA 90027  
(310) 498-5640